

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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IN RE: RAHUL MANCHANDA, DEBTOR

INDEX NO. 16-10222-JLG

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) MEMO IN SUPPORT  
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2016 FEB -1 P 3:54

Rahul Manchanda, an Attorney duly admitted to practice throughout the federal, state and local courts of New York State, and in support of his current Chapter 13 filing, does hereby state:


1. This Memo in Support is being submitted to this Honorable Court in order to explain the "extraordinary circumstances" as defined by 12 Moore's Federal Practice Section 60.48[3][b] and the "changed circumstances" as per 11 U.S.C. § 1329(c) as to why I was derailed in my previous Chapter 13 case which was dismissed last January 7, 2015 after my diligent monthly payments thereof;
2. In August 2014 my ex-wife Sharie Kruzic (aka Sharie Manon, Sharie Maes, Sharie O'Buck, Valerie Johnson) and my ex-girlfriend Kate Bose vengefully conspired to have me falsely arrested for a false domestic incident (ex girlfriend later admitted to the ADA in a notarized writing that she lied), threw me out of my own home, completely cut me off from my 2 daughters for 2 years, causing me to be completely destabilized and almost homeless for nearly the entire time;
3. I had to struggle to put my law firm and life back together and it is a long story spanning almost 10 years of non-stop NY Family Court litigation by my ex-wife and her free of charge feminist lawyers Sanctuary for Families in order to destroy my million dollar law practice, reputation, and life, rendering me bankrupt, credit ruined, emotionally/ physically/ mentally/ psychologically shattered.
4. Each and every time my ex-wife and I would conclude yet another family court battle that she invariably instigated out of spite, each one taking 2 years or more, devastating my finances, organization, law practice, and taking its toll on me in every way, she would thereupon commence a new litigation only a few months later, coddled, supported and protected by family court judges and her free lawyers, totaling more than 10 years of steady, constant, destabilizing, costly (at least for me who had to pay for private lawyers), exhausting

litigation all over again, thus compounding my financial difficulties and stress.

5. Now my ex-wife Sharie Kruzic has dragged me to New Haven CT Superior Court for more abuse of the court system and judicial process where she is continuing her onslaught over there as well, further destabilizing and terrorizing me over there, after New York literally threw her out of the family courts.
6. Prior to all of this above described drama, I was diligently paying each and every month to the appointed trustee, but obviously, after this false domestic incident terrorist attack, I was completely out of commission, dealing with the family, civil, and IDV Courts for nearly 2 years, while trying to earn a living, pay my bills, stay afloat, regain my balance, and rebuild my life - but my financial problems and burdens (crushing 6 figure tax debt from IRS and NYS, Student Loans, Child Support, others) did not go away, they just got more heavy.
7. My previous bankruptcy lawyer Julio Portilla who for approximately 1 month prior to this filing lead me to believe that he would either reopen my prior Chapter 13 case or file a new one, when only at the last minute, when it had to be filed on Friday January 29, 2016, he abruptly and cruelly decided that he would not represent me, thus forcing me to file this case by myself, *pro se*. A disciplinary complaint is currently pending against him with the Departmental Disciplinary Committee First Department for this ethical misconduct and behavior.
8. And now, facing eviction from both home and office, and with a New Haven CT Superior Court Judge Jane Emons demanding my financials after NY Family Court only in July 2014 settling the child support issue 1 month before the above referenced coordinated false domestic incident by my ex-wife and ex-girlfriend in August 2014, I am facing the same financial oblivion again.

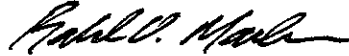
**WHEREFORE**, in light of the foregoing, Undersigned hereby respectfully requests that this Honorable Court sustain my current Chapter 13 case administration and keep the automatic Stay in place during its pendency.

**Dated:** January 29, 2016  
New York, NY

  
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Rahul Manchanda, Esq.  
17 State Street, Suite 4000  
New York, NY 10004  
Tel: (212) 968-8600  
Fax: (212) 968-8601

**ATTORNEY CERTIFICATION OF SERVICE**

On January 29, 2016 the undersigned did deliver a copy of the attached Memo in Support Brief to the relevant Respondents by US Mail.



Rahul Manchanda, Esq.  
17 State Street Suite 4000  
New York, NY 10004  
Tel: (212) 968-8600  
Fax: (212) 968-8601